

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

MICROUNITY SYSTEMS ENGINEERING, §
INC., a California corporation, §
Plaintiff, §

v. §

(1) APPLE, INC., a California corporation, §
(2) AT&T INC., a Delaware corporation, §
(3) AT&T MOBILITY LLC, a Delaware limited §
liability company, (4) CELLCO PARTNERSHIP, §
a Delaware partnership, (5) EXEDEA, INC., a Texas §
corporation, (6) GOOGLE INC., a Delaware §
corporation, (7) HTC CORPORATION, a Republic §
of China corporation, (8) HTC AMERICA, INC., §
a Texas corporation, (9) LG Electronics, Inc., a §
Korean limited company, (10) LG Electronics §
Mobilecomm U.S.A., Inc., a California corporation, §
(11) MOTOROLA MOBILITY, INC., a Delaware §
corporation, (12) NOKIA CORPORATION §
a Finnish corporation, (13) NOKIA INC., a §
Delaware corporation, (14) PALM, INC., a §
Delaware corporation, (15) QUALCOMM INC., a §
Delaware corporation, (16) SAMSUNG §
ELECTRONICS CO., LTD., a Korean limited §
company, (17) SAMSUNG §
SEMICONDUCTOR INC., a California §
corporation, (18) SAMSUNG §
TELECOMMUNICATIONS AMERICA, LLC, §
a Delaware limited liability company, (19) SPRINT §
SPECTRUM LP, a Delaware limited partnership, §
(20) TEXAS INSTRUMENTS INC., a Delaware §
corporation, §

Defendants.

Case No. 02:10-cv-91-TJW-CE
Consolidated with Case No. 02:10-
cv-185-TJW-CE

Jury Trial Demanded

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff MicroUnity Systems Engineering, Inc. (“Plaintiff”) and Defendants Apple, Inc. (“Apple”); AT&T Inc. and AT&T Mobility LLC (collectively, “AT&T Defendants”); Cellco Partnership (“Cellco”); Google Inc. (“Google”); Exedea, Inc., HTC Corporation, and HTC America Inc. (collectively, “HTC Defendants”); LG Electronics, Inc. and LG Electronics MobileComm U.S.A., Inc. (collectively, “LG Defendants”); Motorola Mobility, Inc. (“Motorola”); Nokia Corp. and Nokia Inc. (collectively, “Nokia Defendants”); Palm, Inc. (“Palm”); Qualcomm Inc. (“Qualcomm”); Samsung Electronics Co., Ltd. (“Samsung”); Samsung Semiconductor Inc. (“SSI”); Samsung Telecommunications America, LLC (“STA”); Sprint Spectrum LP (“Sprint”); and Texas Instruments Inc. (“TI”) (collectively, “Defendants”) jointly move for entry of a Protective Order, which is attached as Exhibit A. The parties have agreed to all provisions in the Protective Order except for Paragraphs 8, 11(a), 12, and 13, which require Court resolution. For ease of reference, Exhibit A contains Plaintiff’s proposal for each disputed paragraph, followed immediately by Defendants’ proposal for that same paragraph, with the disputed portion of each paragraph identified via redlining. Exhibit B sets forth the Plaintiff’s arguments in support of its disputed proposals, and Exhibit C sets forth the Defendants’ arguments in support of their disputed proposals. If any responses are needed, the parties agree that the response will be filed within five business days of the filing of this motion.

The parties request that the Court resolve the parties’ disputes regarding the Protective Order. If the Court wishes, the parties will submit a proposed order reflecting the Court’s ruling at the appropriate time.

May 13, 2011

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2011, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, using the electronic filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/
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